LAWLER, METZGER & MILKMAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

GIL M. STROBEL
PHONE (202) 777-7728

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

July 15, 2003

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W. - Suite TW-A325
Washington, D.C. 20554

Re: *Oral Ex Parte Presentation*
In the Matter of Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Ms. Dortch:

On July 14, 2003, members of the Joint Competitive Industry Group (JCIG) met with John Muleta, Jared Carlson, Uzoma Onyeije and Jennifer Tomchin of the Wireless Telecommunications Bureau to discuss the above-referenced proceeding. The JCIG members attending the meeting included: Kent Nakamura of Nextel; Marc Martin of Kirkpatrick & Lockhart, outside counsel for Nextel; Douglas Brandon of AT&T Wireless; Michael Pryor of Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, outside counsel for AT&T Wireless and AT&T Corp.; Patrick Merrick of AT&T Corp.; Timothy Feldhausen of Keller and Heckman, outside counsel for the American Petroleum Institute; Audrey Glenn of Cable & Wireless; Lisa Smith of MCI; and A. Richard Metzger, Jr. of Lawler, Metzger & Milkman, outside counsel for MCI.

JCIG was formed in January 2002, when organizations representing large business end users joined with competitive carriers to address common problems with incumbent local exchange carriers' (LECs') provisioning, maintenance and repair of interstate special access services. To that end, the group has proposed in its filings in this proceeding a concise, comprehensive set of metrics, standards, reporting requirements and enforcement measures. These proposals, if adopted, would help to ensure that incumbent LECs provide special access services in a manner that is just, reasonable, and not unreasonably discriminatory. Nextel, AT&T Wireless and T-Mobile joined JCIG in 2003, and have urged the Commission to adopt the JCIG proposal.

During Monday's meeting, members of JCIG explained that wireless carriers suffer from the same difficulties that other members of JCIG have encountered with respect to incumbent LEC provisioning, repair and maintenance of interstate special access services. The group discussed the attached presentation describing CMRS carriers' use of special access, the problems caused by poor special access performance and JCIG's proposed solution to these problems.

In accordance with the Commission's rules, this letter is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

Gil M. Strobel

Attachments

cc: John Muleta
Jared Carlson
Uzoma Onyeije
Jennifer Tomchin

ILEC Special Access: The Critical Need for Performance Measurements, Standards, Reporting and Enforcement

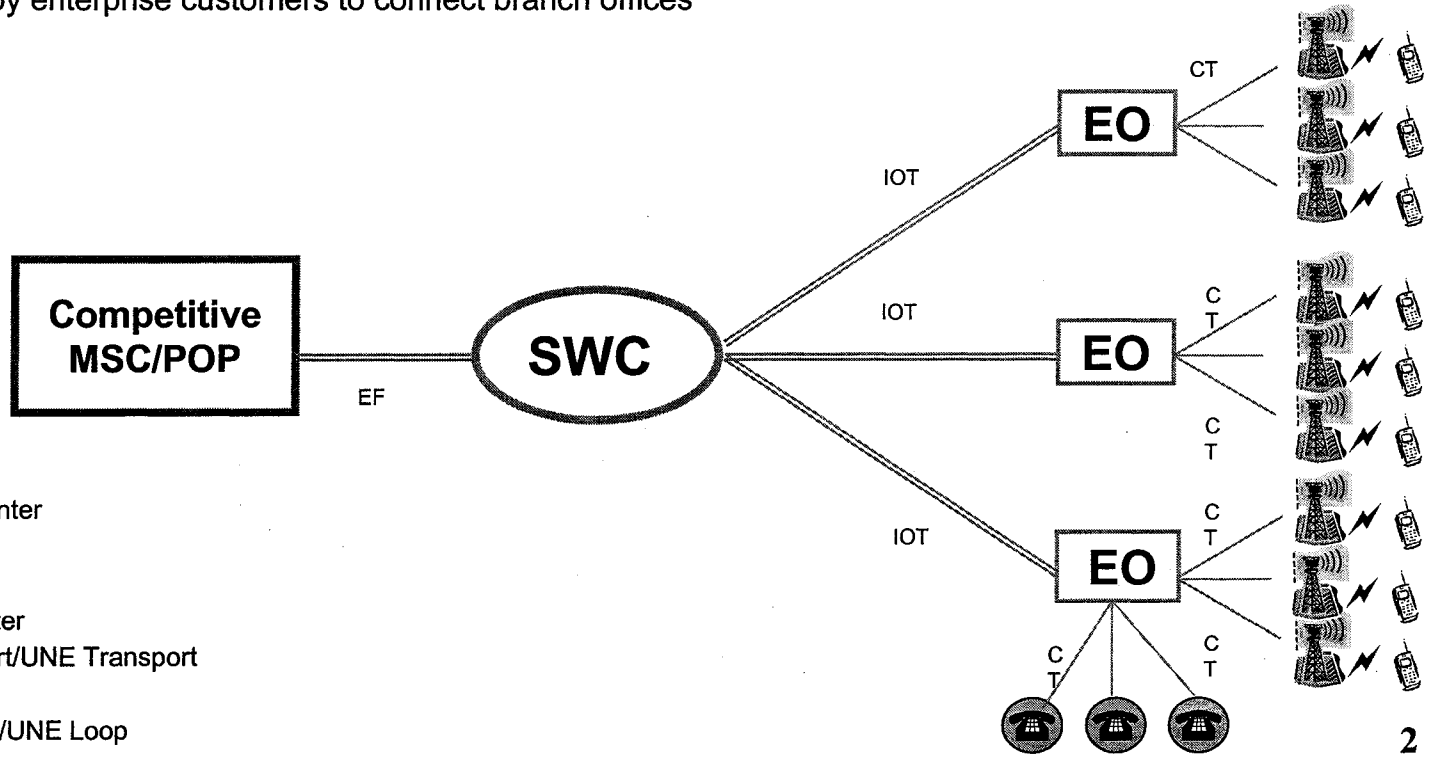
Joint Competitive Industry Group

CC Docket No. 01-321

July 14, 2003

What Is Special Access?

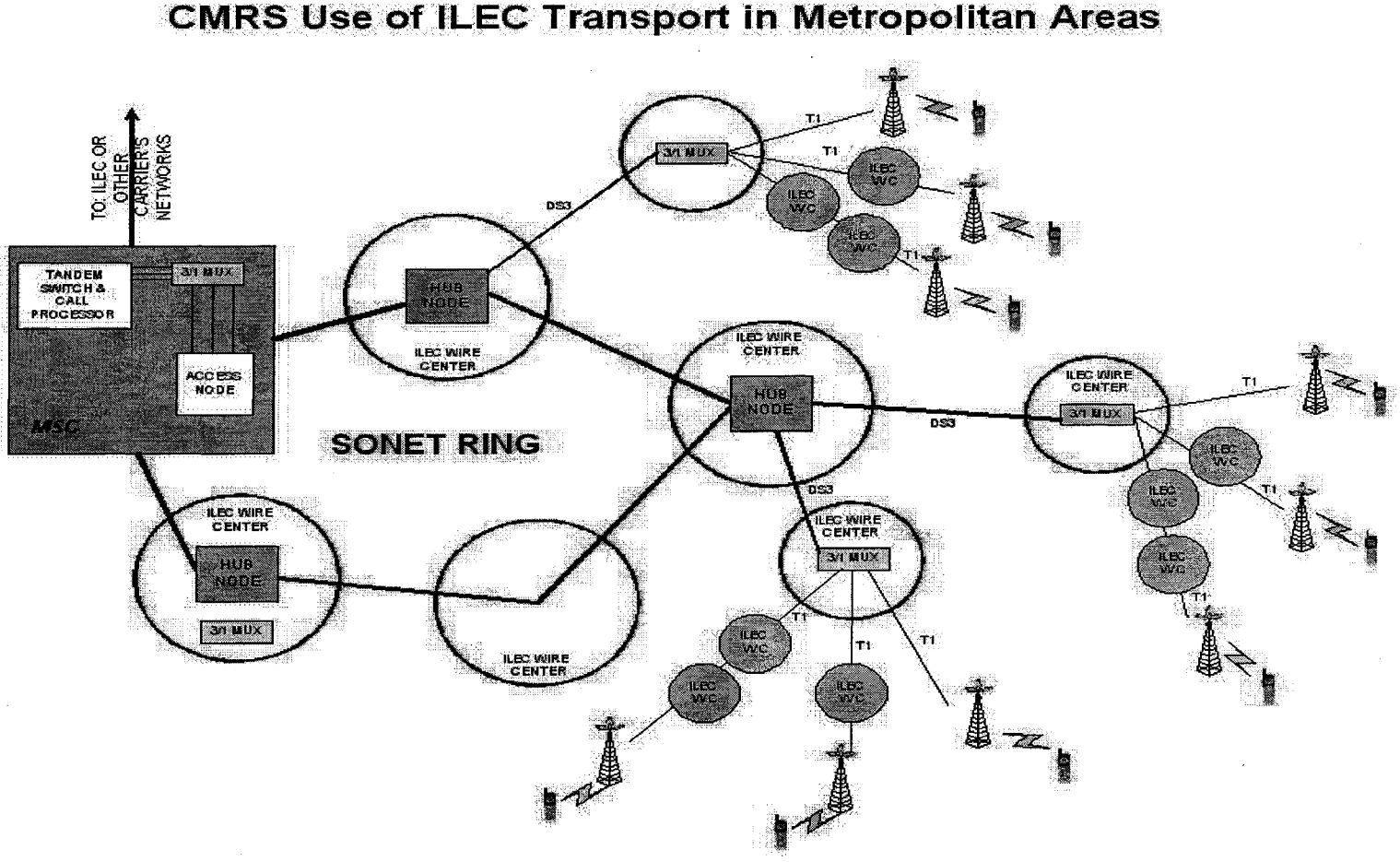
- Special access is:
  - Dedicated (unswitched) links between end-users and a competitor's MSC or POP
  - Provided via the same facilities used to supply UNE loops and transport
  - Used by CMRS carriers to connect cell cites to MSCs
  - Used by wireline carriers for interoffice facilities and local loops
  - Used by enterprise customers to connect branch offices



MSC - Mobile Switching Center
POP - Point of Presence
EF - Entrance Facilities
SWC - ILEC Switching Center
IOT - Inter Office Transport/UNE Transport
EO - ILEC End Office
CT - Channel Termination/UNE Loop

CMRS Carriers' Use of Special Access

A CMRS carrier must obtain transport from virtually every wire center in the CMRS carrier's serving area



CMRS Carriers Depend Heavily on ILEC Special Access to Connect MSCs to Cell Sites

- CMRS networks consist of thousands of cell sites that are used to originate and terminate customers' calls
- Each cell site must be connected to centrally located mobile switching centers (MSCs)
- Cell site-to-MSC connections are overwhelmingly made via wireline transport services purchased from ILEC special access tariffs
- CMRS carriers' reliance on special access will increase as CMRS carriers expand their service areas and upgrade their facilities to provide broadband services

Poor ILEC Performance Continues to Be a Problem

- Persistent problems with ILEC performance include
  - Failure to provide timely provisioning of special access circuits
  - Failure to repair circuits promptly
- These ILEC failures result in increased costs, lost revenues and harm to carriers' reputations
  - End users ultimately bear the burden of service disruptions and other problems caused by poor ILEC performance
- The Commission must guard against the possibility that ILECs with CMRS affiliates will discriminate unlawfully against unaffiliated CMRS providers

JCIG Has Proposed a Comprehensive "Turn-Key" Solution to Address Tier 1 ILECs' Continuing Poor Performance

- **Measurement:** ILECs would measure their performance with respect to key special access activities

- **Standards:** ILEC performance would be assessed based on objective standards designed to prevent unjust, unreasonable and unlawfully discriminatory practices

- **Reporting:** To facilitate detection of unreasonably discriminatory practices, the ILECs would provide performance reports
  - On a customer-specific basis for ILEC special access customers
  - On an aggregated basis for the following groups: unaffiliated CMRS providers; affiliated CMRS providers; competitive wireline providers; affiliated wireline providers; and end users

- **Enforcement:** Enforcement mechanisms would ensure that sub-standard or unreasonably discriminatory performance would lead to timely and appropriate payments to carriers (service credits and/or damages) as well as forfeitures

How Do We Measure Performance?

- Eight Core Measures Capture Ordering and Provisioning
  - FOC Receipt
  - FOC Receipt Past Due
  - Offered Versus Requested Due Date
  - On Time Performance To FOC Due Date
  - Days Late (when FOC Due Date missed)
  - Average Intervals – Requested / Offered / Installation
  - Past Due Circuits
  - New Installation Trouble Report Rate
- Three Key Measures for Maintenance and Repair
  - Failure Rate
  - Mean Time to Restore
  - Repeat Trouble Report Rate

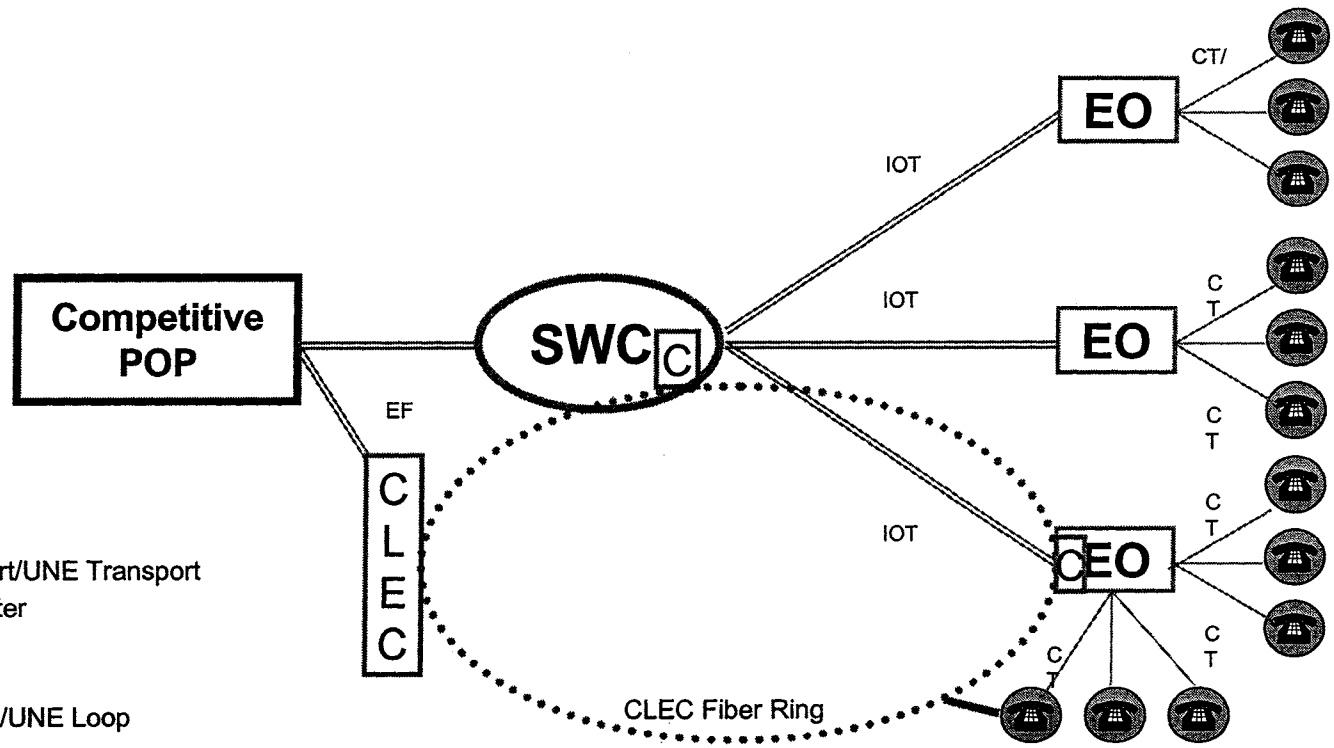
Measuring ILEC Performance in the Provisioning of Special Access Services

Joint Competitive Industry Group
Proposal

April 29, 2003

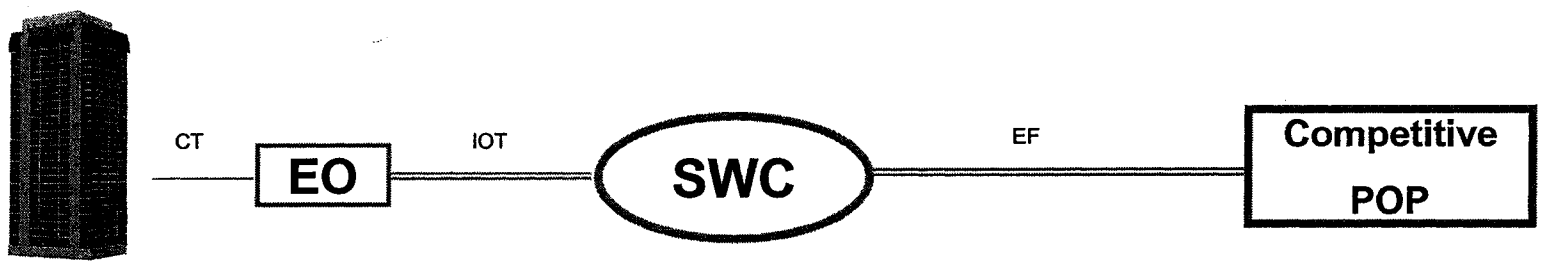
What is Special Access?

- Special access is:
  - Dedicated (unswitched) links between end-users and a competitor's POP
  - Provided via the same facilities used to supply UNE loops and transport
  - Widely used by competitive carriers for interoffice facilities and local loops
  - Used by enterprise customers to connect branch offices



POP - Point of Presence
IOT - Inter Office Transport/UNE Transport
SWC - ILEC Switching Center
EO - ILEC End Office
EF - Entrance Facilities
CT - Channel Termination/UNE Loop
C - CLEC Collocation

End Users Rely on Special Access to Connect to a Competitive Carrier's Network or to Connect Branch Offices



POP - Point of Presence
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How Do We Measure Performance?

❑ Eight Core Measures Capture Ordering and Provisioning

- FOC Receipt
- FOC Receipt Past Due
- Offered Versus Requested Due Date
- On Time Performance To FOC Due Date
- Days Late (when FOC Due Date missed)
- Average Intervals – Requested / Offered / Installation
- Past Due Circuits
- New Installation Trouble Report Rate

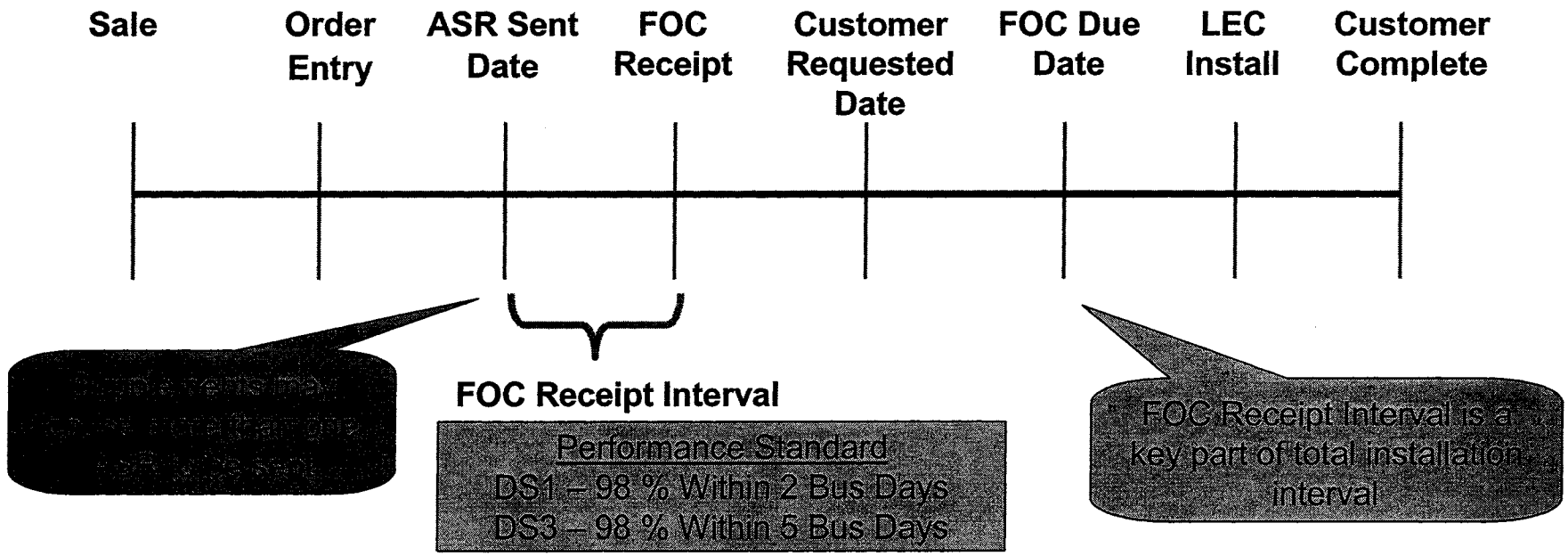
❑ Three Key Measures for Maintenance and Repair

- Failure Rate
- Mean Time to Restore
- Repeat Trouble Report Rate

How Do We Measure Ordering Performance?

FOC Receipt

DEFINITION: Measures the interval between the time a Competing Carrier, or very large end-user customer, sends an Access Service Request (ASR) and the return of a Firm Order Confirmation (FOC), with a Committed Due Date, by the ILEC

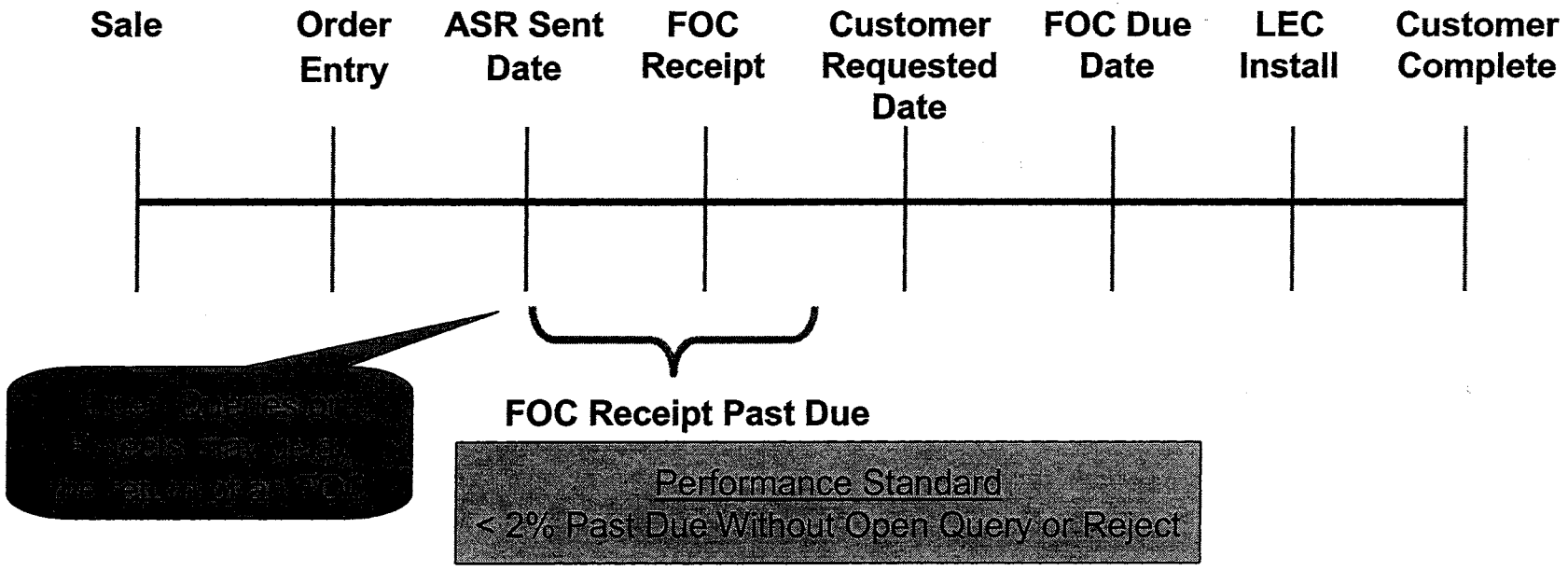


BUSINESS NEED: Provides the Competing Carrier, or very large end-user customer, with the date to expect the installation or other work to be done.

How Do We Measure Ordering Performance? (cont'd)

FOC Receipt Past Due

DEFINITION: Tracks all open ASR requests that have not received an FOC from the ILEC, within the expected FOC receipt interval, as of the last day of the reporting period.

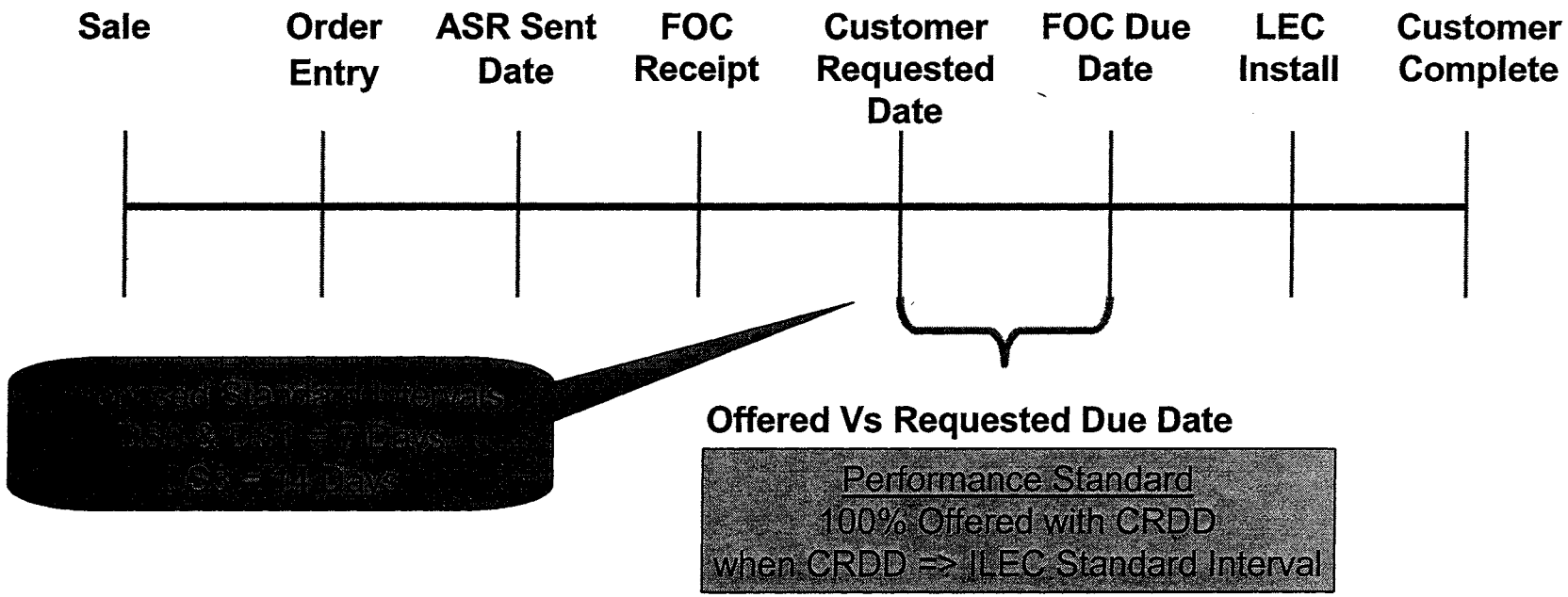


BUSINESS NEED: Measures the magnitude of late FOCs and is essential to ensure that FOCs are being received in a timely manner from the ILECs

How Do We Measure Ordering Performance? (cont'd)

Offered Versus Requested Due Date

DEFINITION: Measures the Percentage of time the FOC Due Date is equal to the Customer Requested Due date when the date requested is equal to or greater than the ILEC Standard Interval

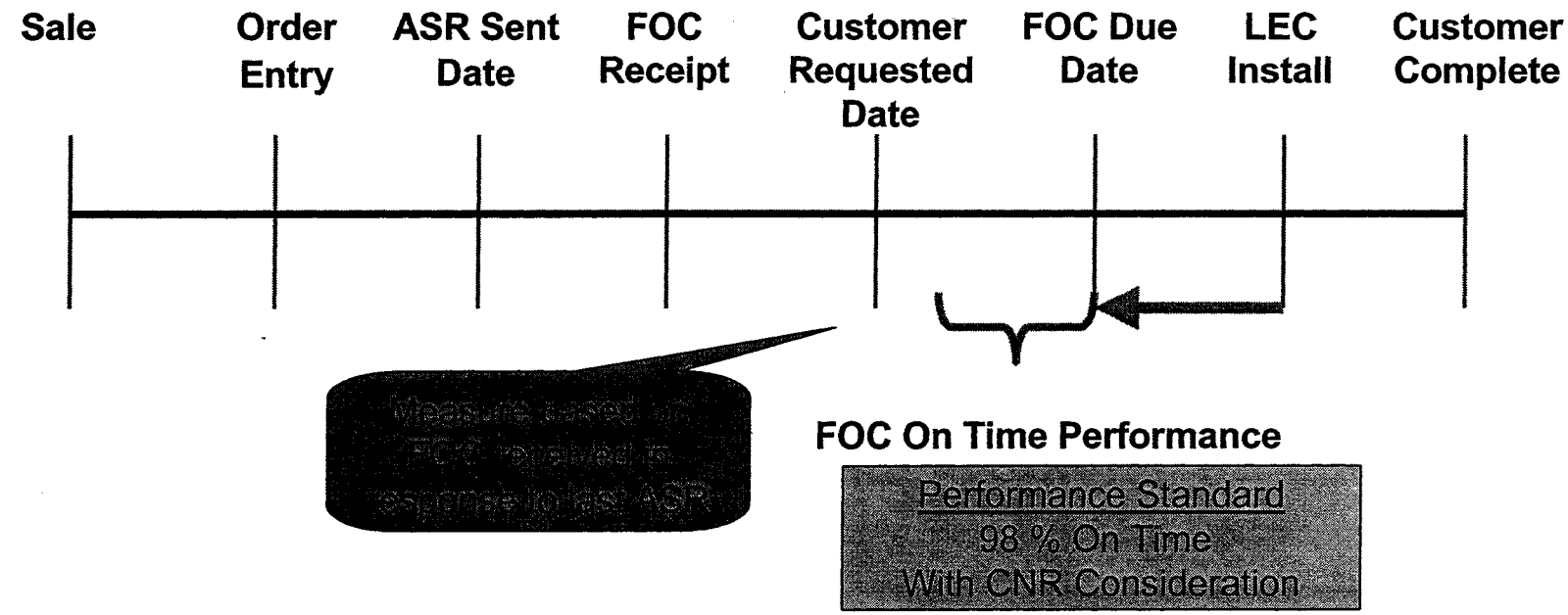


BUSINESS NEED: Reflects the degree to which the ILEC is committing to install service on the Customer Requested Due Date.

How Do We Measure Provisioning Performance?

On Time Performance To FOC Due Date

DEFINITION: Measures the percentage of time that the ILEC completes the installation on or before the FOC Due Date with CNR (Customer Not Ready) consideration. CNR coded orders are counted as an appointment met

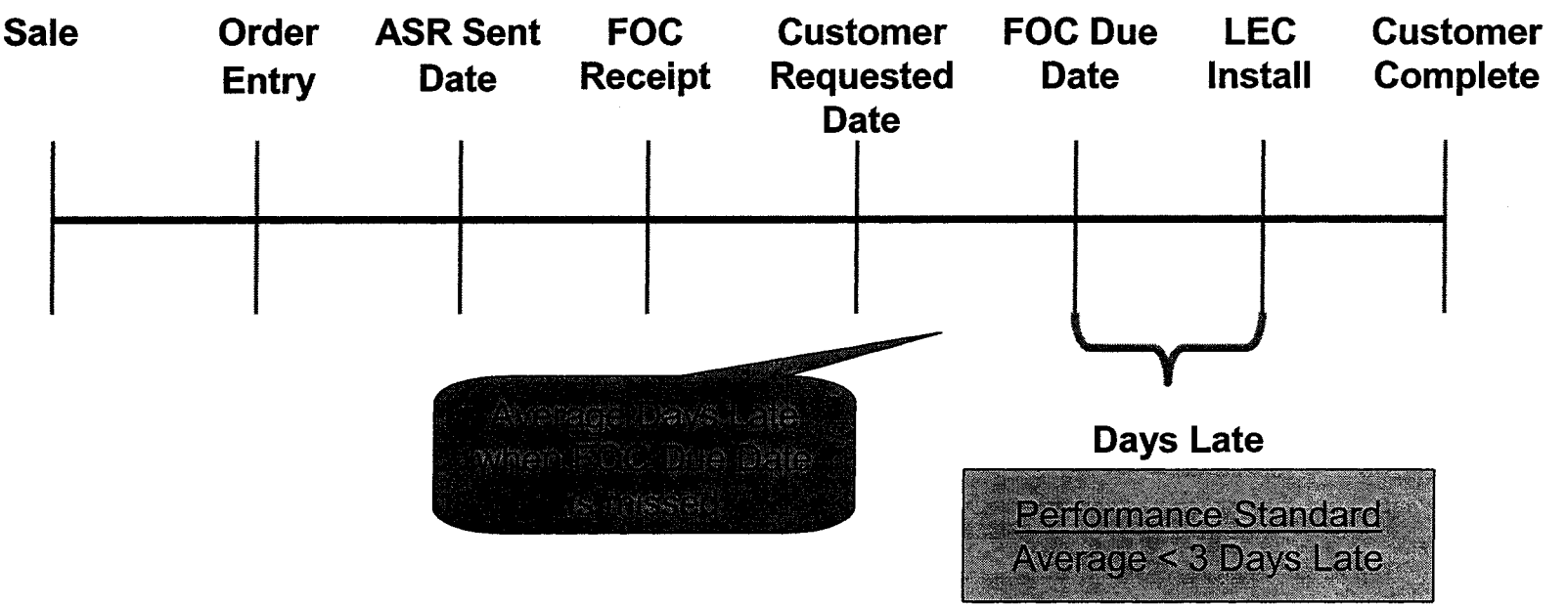


BUSINESS NEED: Indicates the degree of reliability of the ILEC in meeting its own committed due date

How Do We Measure Provisioning Performance? (cont'd)

Days Late

DEFINITION: Measures the average days late for those orders not completed by the FOC Due Date

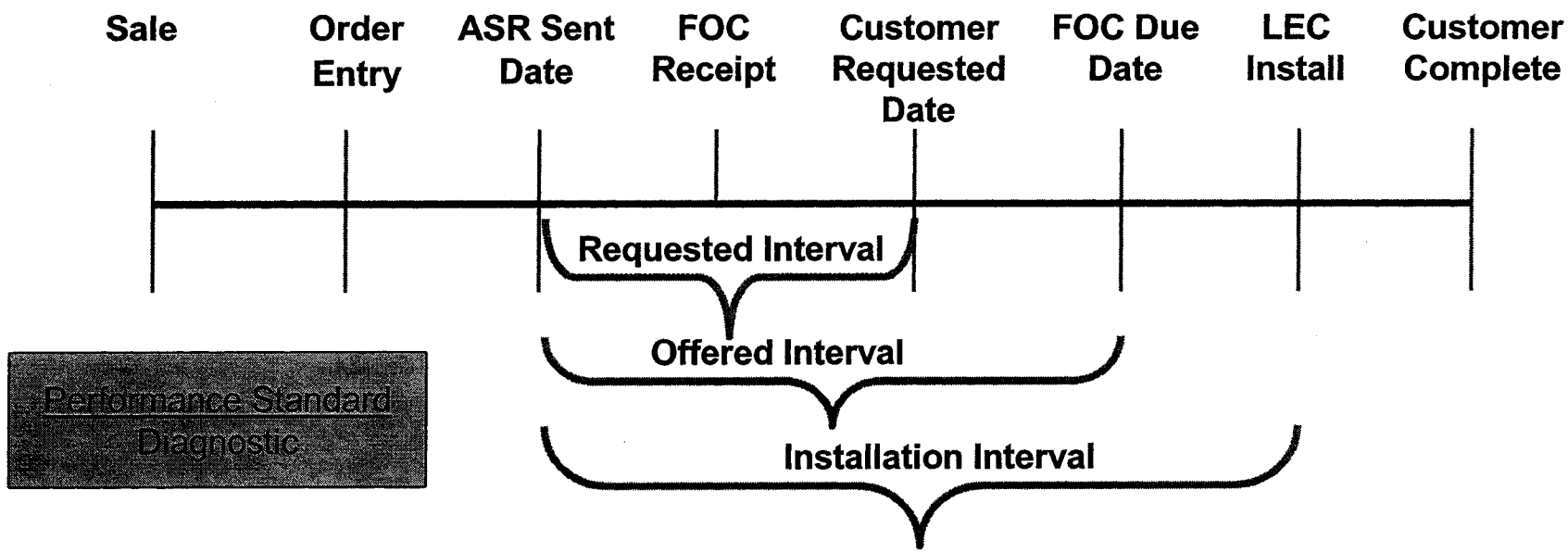


BUSINESS NEED: Reflects the magnitude of the ILEC failure to meet their committed date

How Do We Measure Provisioning Performance? (cont'd)

Average Intervals – Requested / Offered / Installation

DEFINITION: Measures the intervals between the date the Competing Carrier (or very large end-user customer) sends the last "clean" ASR and the Customer Requested Due Date, the Offered FOC Due Date, and the Actual Installation Date

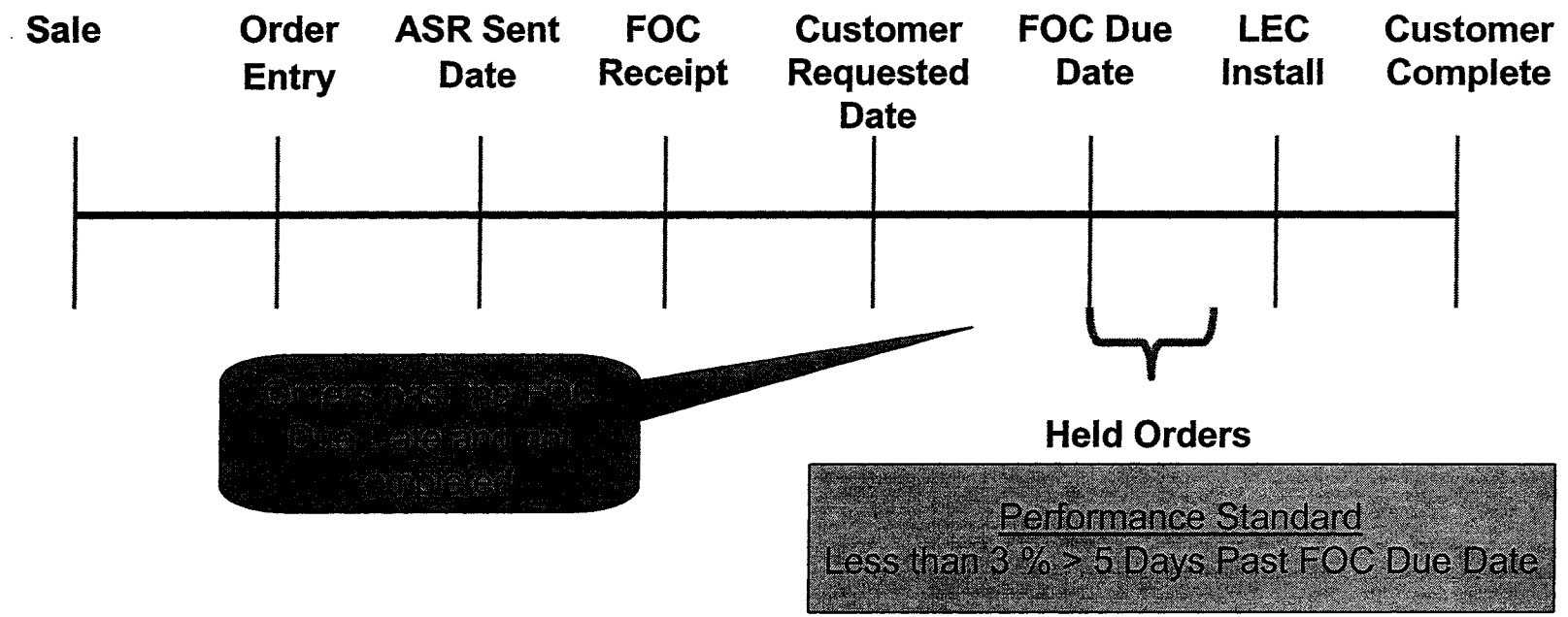


BUSINESS NEED: The average intervals provide a comprehensive view of provisioning with the ultimate goal to have the three intervals equal

How Do We Measure Provisioning Performance? (cont'd)

Past Due Circuits

DEFINITION: Provides a snapshot view of Circuits that are past the FOC Due Date as of the end of the reporting period

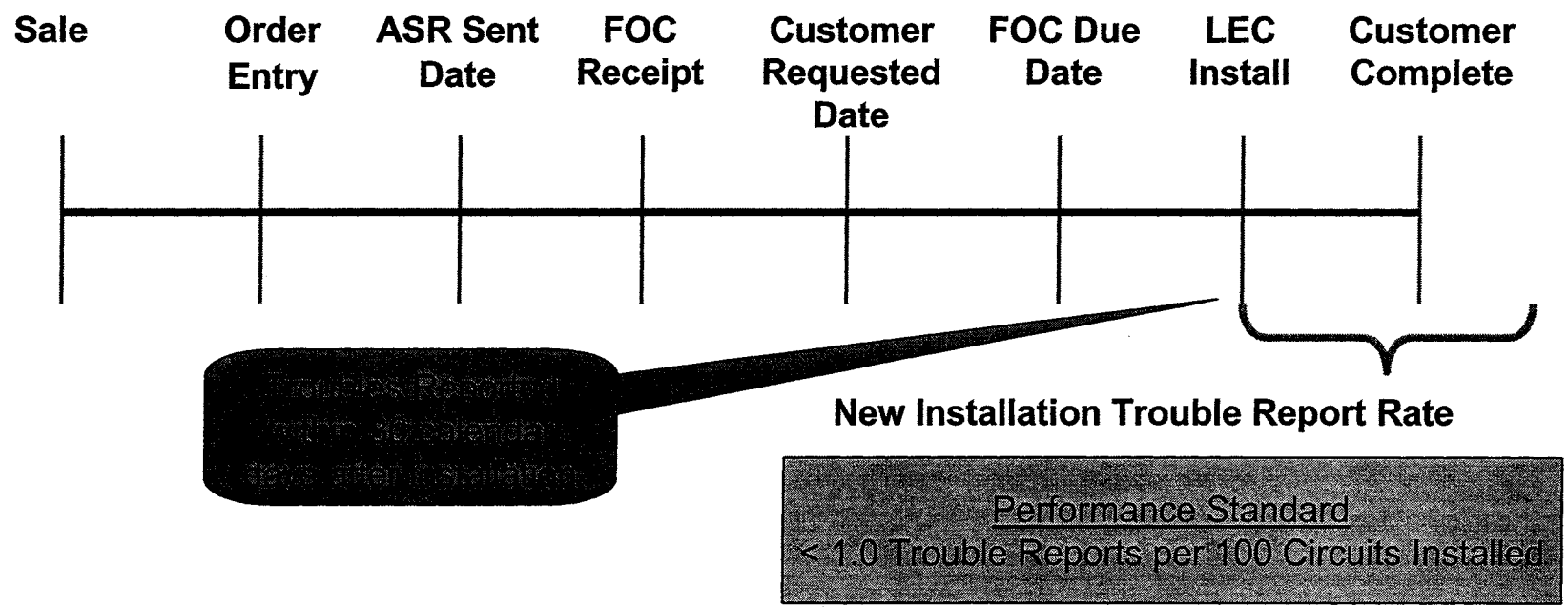


BUSINESS NEED: Captures order backlog by monitoring the status of past due orders.

How Do We Measure Provisioning Performance? (cont'd)

New Installation Trouble Report Rate

DEFINITION: Captures the rate of trouble reports on new circuits within 30 calendar days of the installation

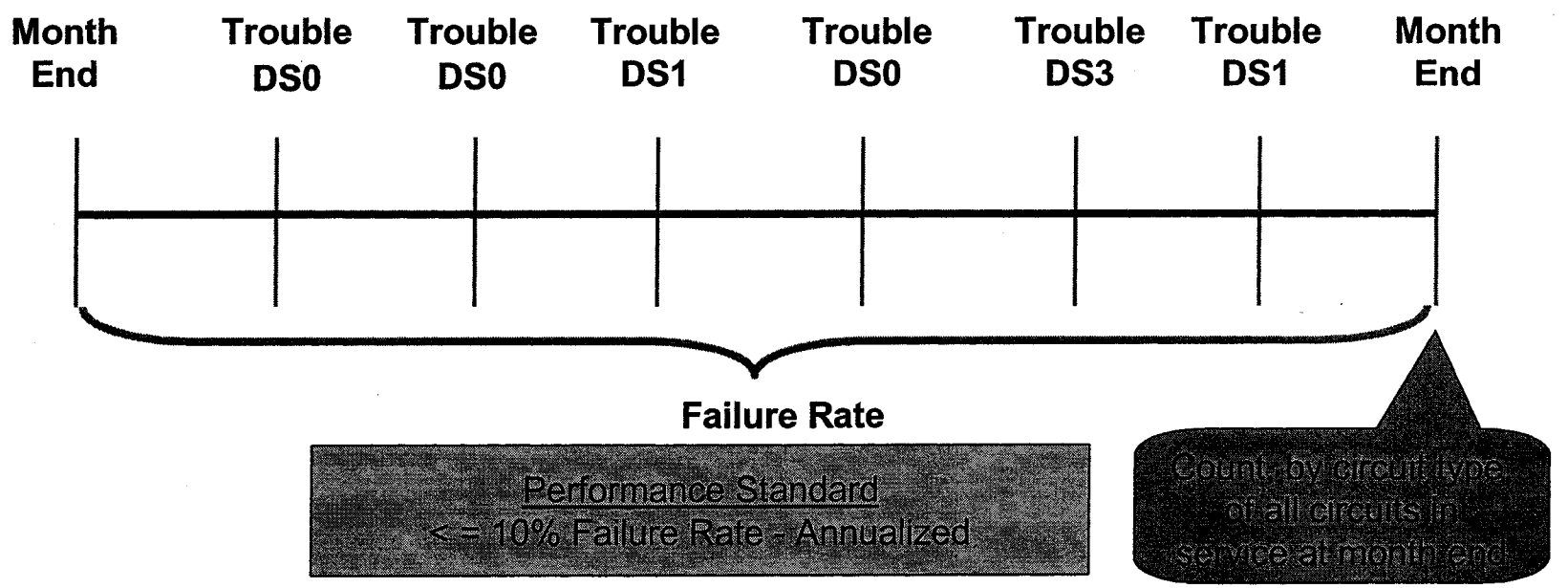


BUSINESS NEED: Measures the quality of the installation work provided

How Do We Measure Maintenance & Repair ?

Failure Rate

DEFINITION: The number of troubles resolved during the reporting period divided by the total number of "in service circuits" at the end of the reporting period, displayed as an annualized rate

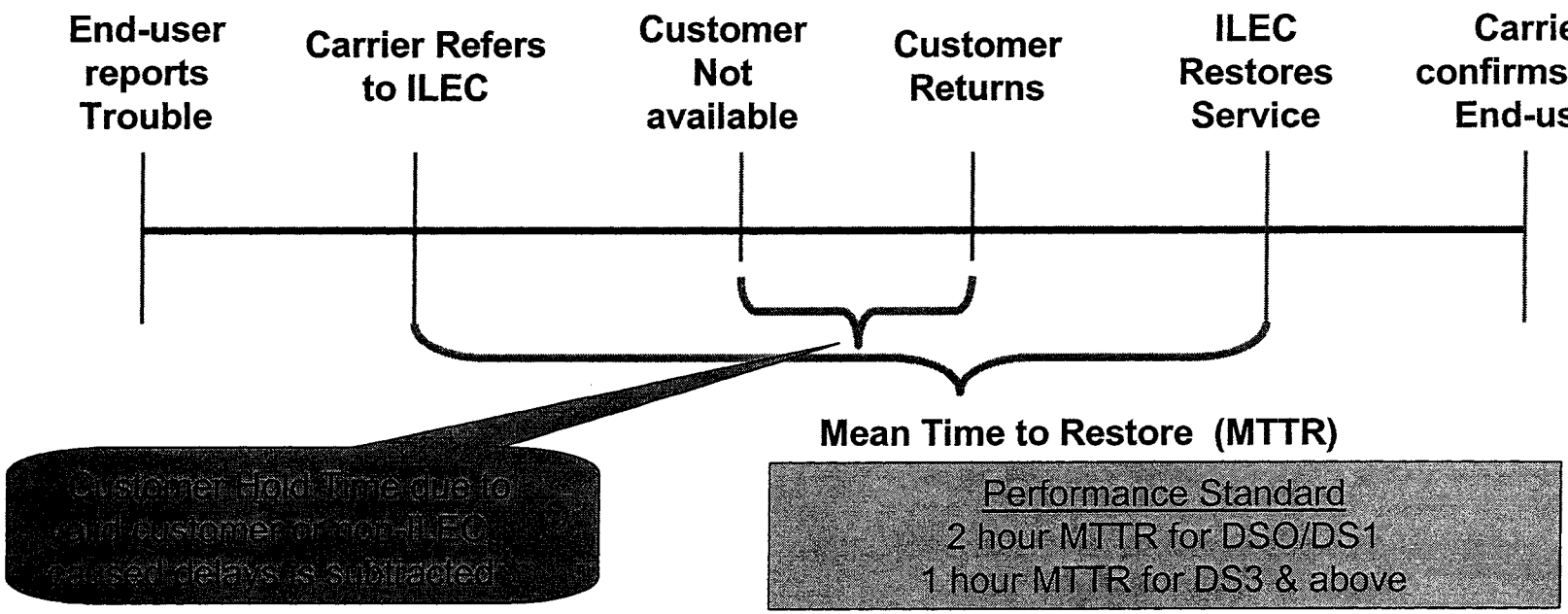


BUSINESS NEED: Measures the overall quality of the circuits being provided

How Do We Measure Maintenance & Repair ? (cont'd)

Mean Time to Restore

DEFINITION: Measures the promptness in restoring circuits to normal operating levels when a problem is referred to the ILEC for resolution.



BUSINESS NEED: Captures the responsiveness of the ILEC in restoring circuits with trouble conditions

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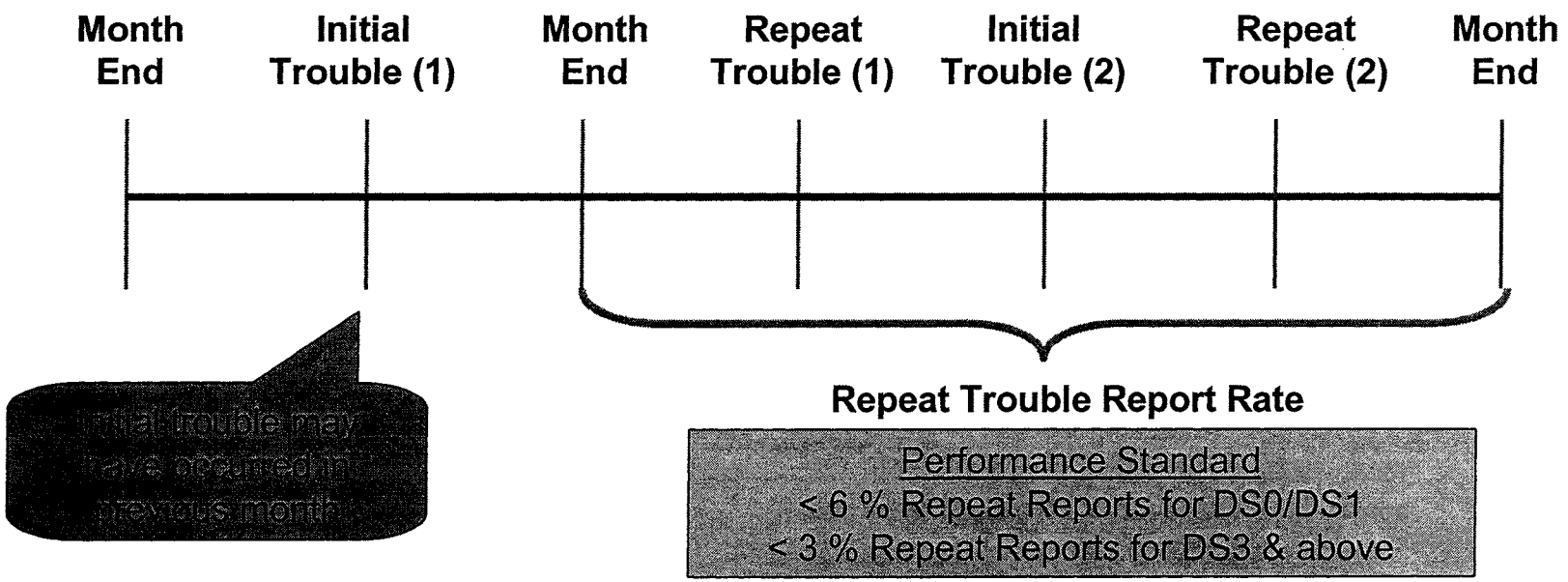
How Do We Measure Maintenance & Repair ? (cont'd)

Repeat Trouble Report Rate

DEFINITION: The percent of maintenance troubles resolved during the reporting period that had at least one prior trouble ticket, on the same circuit, at any time in the preceding 30 calendar days from the creation of the current trouble report.



BUSINESS NEED: Measures the quality of the maintenance work performed

ATTACHMENT A

Joint Competitive Industry Group Proposal

ILEC PERFORMANCE MEASUREMENTS & STANDARDS

in the

Ordering, Provisioning,

and

Maintenance & Repair

of

SPECIAL ACCESS SERVICE

Version 1.1

Issued: January 18, 2002

ILEC Performance Measurements and Standards

TABLE OF CONTENTS

Reporting Dimensions

CLEC or IXC Carrier specific total, with the following reporting dimensions for all measurements.

- Special Access disaggregated by bandwidth
  Sub Totaled by State
  Totaled by ILEC

Comparison reports are required for:

- CLEC/ IXC Carrier Aggregate
- ILEC Affiliates Aggregate

Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing ILEC end office switches.

Special access services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.

Exclusions: Transmission path requests pursuant to an Interconnection Agreement for Unbundled Network Elements are excluded from these Performance Measures.

Reporting Period: The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to one decimal point.

ILEC Performance Measurements and Standards

ORDERING

Measurement: JIP-SA-1 FOC Receipt

Description

The Firm Order Confirmation (FOC) is the ILEC response to an Access Service Request (ASR), whether an initial or supplement ASR, that provides the CLEC or IXC Carrier with the specific Due Date on which the requested circuit or circuits will be installed. The expectation is that the ILEC will conduct a minimum of an electronic facilities check to ensure due dates delivered in FOCs can be relied upon. The performance standard for FOCs received within the standard interval is expressed as a percentage of the total FOCs received during the reporting period. A diagnostic distribution is required along with a count of ASRs withdrawn at the ILEC's request due to a lack of ILEC facilities or otherwise.

Calculation Methodology

Percent Meeting Performance Standard:
[Count FOCs received where (FOC Receipt Date – ASR Sent Date) < = Performance Standard] / Total FOCs received during reporting period x 100

FOC Receipt - Distribution:
(FOC Receipt Date – ASR Sent Date), for each FOC received during reporting period, distributed by:
0 day, 1 day, 2 days, through 10 days and > 10 days

ASRs Withdrawn at ILEC Request due to a lack of ILEC Facilities or Otherwise
Count of ASRs, which have not yet received a FOC, Withdrawn at ILEC Request, during the current reporting period, due to a lack of ILEC facilities or otherwise

Business Rules

1. Counts are based on each instance of a FOC received from the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent FOCs Received within Standard	- DS0	= > 98.0% within 2 business days
	- DS1	= > 98.0% within 2 business days
	- DS3	= > 98.0% within 5 business days
	- OCn	- ICB (Individual Case Basis)
FOC Receipt Distribution	- Diagnostic	

ASRs Withdrawn at ILEC Request Due to a Lack of ILEC Facilities or Otherwise - Diagnostic

ILEC Performance Measurements and Standards

ORDERING

Measurement: JIP-SA-2 FOC Receipt Past Due

Description

The FOC Receipt Past Due measure tracks all ASR requests that have not received an FOC from the ILEC within the expected FOC receipt interval, as of the last day of the reporting period and do not have an open, or outstanding, Query/Reject. This measure gauges the magnitude of late FOCs and is essential to ensure that FOCs are being received in a timely manner from the ILECs. A distribution of these late FOCs, along with a report of those late FOCs that do have an open Query/Reject, is required for diagnostic purposes.

Calculation Methodology

Percent FOC Receipt Past Due - Without Open Query/Reject:

Sum of ASRs without a FOC Received, and a Query/Reject is not open, where (End of Reporting Period – ASR Sent Date >Expected FOC Receipt Interval) / Total number of ASRs sent during reporting period x 100

FOC Receipt Past Due - Without Open Query/Reject - Distribution:

[(End of Reporting Period – ASR Sent date) – (Expected FOC Receipt Interval)] for ASRs without a FOC received and a Query/Reject is not open with the CLEC or IXC Carrier, distributed by;
1-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Percent FOC Receipt Past Due - With Open Query/Reject:

Sum of ASRs without a FOC Received, and a Query/Reject is open, where (End of Reporting Period – ASR Sent Date > Expected FOC Receipt Interval) / Total number of ASRs sent during reporting period x 100

Business Rules

1. All counts are based on the latest ASR request sent to the ILEC. Where one or more subsequent ASRs have been sent, only the latest ASR would be recorded as Past Due if no FOC had yet been returned.
2. The Expected FOC Receipt Interval, used in the calculations, will be the interval identified in the Performance Standards for the FOC Receipt measure.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent FOC Receipt Past Due - Without Open Query/Reject	< 2.0 % FOC Receipt Past Due
FOC Receipt Past Due – Without Open Query/Reject - Distribution	- Diagnostic
Percent FOC Receipt Past Due - With Open Query/Reject	- Diagnostic

ILEC Performance Measurements and Standards

ORDERING

Measurement: JIP-SA-3 Offered Versus Requested Due Date

Description

The Offered Versus Requested Due Date measure reflects the degree to which the ILEC is committing to install service on the CLEC or IXC Carrier Requested Due Date (CRDD), when a Due Date Request is equal to or greater than the ILEC stated interval. A distribution of the delta, the difference between the CRDD and the Offered Date, for these FOCs is required for diagnostic purposes.

Calculation Methodology

Percent Offered with CLEC or IXC Carrier Requested Due Date:
[Count of ASRs where (FOC Due Date = CRDD] / [Total number of ASRs where (CRDD – ASR Sent Date) = > ILEC Stated Interval] x 100

Offered versus Requested Interval Delta – Distribution:
[(Offered Due Date – CRDD) where (CRDD – ASR Sent Date) = > ILEC Stated Interval] for each FOC received during the reporting period, distributed by; 0 Days, 1-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Business Rules

1. Counts are based on each instance of a FOC received from the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent Offered with CRDD (where CRDD = > ILEC Stated Interval) = 100%
Offered versus Requested Interval Delta – Distribution - Diagnostic

ILEC Stated Intervals: To be determined by ILEC

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: JIP-SA-4 On Time Performance To FOC Due Date

Description

On Time Performance To FOC Due Date measures the percentage of circuits that are completed on the FOC Due Date, as recorded from the FOC received in response to the last ASR sent. Customer Not Ready (CNR) situations may result in an installation delay. The On Time Performance To FOC Due Date is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.

Calculation Methodology

Percent On Time Performance to FOC Due Date – With CNR Consideration:

[(Count of Circuits Completed on or before ILEC Committed Due Date + Count of Circuits Completed after FOC Due Date with a verifiable CNR code) / (Count of Circuits Completed in Reporting Period)] x 100

Percent On Time Performance to FOC Due Date – Without CNR Consideration:

[(Count of Circuits Completed on or before ILEC Committed Due Date) / (Count of Circuits Completed in Reporting Period)] x 100

Note: The denominator for both calculations is the total count of circuits completed during the reporting period, including all circuits, with and without a CNR code.

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to the CLEC or IXC Carrier.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. The ILEC must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Percent On Time to FOC Due Date - With CNR Consideration = > 98.0 % On Time

Percent On Time to FOC Due Date - Without CNR Consideration - Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: JIP-SA-5 Days Late

Description

Days Late captures the magnitude of the delay, both in average and distribution, for those circuits not completed on the FOC Due Date, and the delay was not a result of a verifiable CNR situation. A breakdown of delay days caused by a lack of ILEC facilities is required for diagnostic purposes.

Calculation Methodology

Average Days Late:

Σ[Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code)] / (Count of Circuits Completed Beyond ILEC Committed Due Date without a CNR code)

Days Late Distribution:

Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code) distributed by: 1 day, 2-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Average Days Late Due to a Lack of ILEC Facilities:

Σ[Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code and due to a Lack of ILEC Facilities] / (Count of Circuits Completed Beyond ILEC Committed Due Date without a CNR code and due to a Lack of ILEC Facilities)

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. The ILEC must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Average Days Late	< 3.0 Days
Days Late Distribution	- Diagnostic
Average Days Late Due to a Lack of ILEC Facilities	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: JIP-SA-6 Average Intervals - Requested/Offered/Installation

Description

The intent of this measure is to capture three important aspects of the provisioning process and display them in relation to each other. The Average CLEC or IXC Carrier Requested Interval, the Average ILEC Offered Interval, and the Average Installation Interval, provide a comprehensive view of provisioning, with the ultimate goal of having these three intervals equivalent.

Calculation Methodology

Average CLEC or IXC Carrier Requested Interval:
Sum (CRDD – ASR Sent Date) / Total Circuits Completed during reporting period

Average ILEC Offered Interval:
Sum (FOC Due Date – ASR Sent Date) / Total Circuits Completed during reporting period

Average Installation Interval:
Sum (ILEC Completion Date – ASR Sent Date) / Total Circuits Completed during reporting period

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.
5. The Average Installation Interval includes all completions.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

Average Requested Interval	- Diagnostic
Average Offered Interval	- Diagnostic
Average Installation Interval	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: JIP-SA-7 Past Due Circuits

Description

The Past Due Circuits measure provides a snapshot view of circuits not completed as of the end of the reporting period. The count is taken from those circuits that have received an FOC Due Date but the date has passed. Results are separated into those held for ILEC reasons and those held for CLEC or IXC Carrier reasons (CNRs), with a breakdown, for diagnostic purposes, of Past Due Circuits due to a lack of ILEC facilities. A diagnostic measure, Percent Cancellations After FOC Due Date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC Due Date had passed

Calculation Methodology

Percent Past Due Circuits:

[(Count of all circuits not completed at the end of the reporting period > 5 days beyond the FOC Due Date, grouped separately for Total ILEC Reasons, Lack of ILEC Facility Reasons, and Total CLEC/Carrier Reasons) / (Total uncompleted circuits past FOC Due Date, for all missed reasons, at the end of the reporting period)] x 100

Past Due Circuits Distribution:

Count of all circuits past the FOC Due Date that have not been reported as completed (Calculated as last day of reporting period - FOC Due Date) Distributed by: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 Days, > 40 days

Percent Cancellations After FOC Due Date:

[Count (All circuits cancelled during reporting period, that were Past Due at the end of the previous reporting period, where (Date Cancelled > FOC Due Date) / (Total circuits Past Due at the end of the previous reporting period)] x 100

Business Rules

1. Calculation of Past Due Circuits is based on the most recent ASR and associated FOC Due Date.
2. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all segments are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is or is not identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. The ILEC must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Record ASRs

Levels of Disaggregation

- DSO / DS1 / DS3 / OCn

Performance Standard

Percent Past Due Circuits - Total ILEC Reasons	< 3.0 % > 5 days beyond FOC Due Date
Percent Past Due Circuits - Due to Lack of ILEC Facilities	- Diagnostic
Percent Past Due Circuits - Total CLEC Reasons	- Diagnostic
Past Due Circuits Distribution	- Diagnostic
Percent Cancellation After FOC Due Date	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: JIP-SA-8 New Installation Trouble Report Rate

Description

New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation.

Calculation Methodology

Trouble Report Rate Within 30 Calendar Days of Installation:
[Count (trouble reports within 30 Calendar Days of Installation) / (Total Number of Circuits Installed in the Report Period)] x 100

Business Rules

1. The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to the CLEC or IXC Carrier.
2. The calculation for the preceding 30 calendar days is based on the creation date of the trouble ticket.

Exclusions

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- Tickets used to track referrals of misdirected calls
- CLEC or IXC Carrier requests for informational tickets

Levels of Disaggregation

- DS0
- DS1
- DS3
- OCn

Performance Standard

New Installation Trouble Report Rate < = 1.0 trouble reports per 100 circuits installed

ILEC Performance Measurements and Standards

MAINTENANCE & REPAIR

Measurement: JIP-SA-9 Failure Rate

Description

Failure Rate measures the overall quality of the circuits being provided by the ILEC and is calculated by dividing the number of troubles resolved during the reporting period by the total number of "in service" circuits, at the end of the reporting period, and is then annualized by multiplying by 12 months.

Calculation Methodology

Failure Rate – Annualized:

{[(Count of Trouble Reports resolved during the Reporting Period) / (Number of Circuits In Service at the end of the Report Period)] x 100} x 12

Business Rules

1. A trouble report/ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when the ILEC issues notice to the CLEC or IXC Carrier that the circuit has been restored to normal operating parameters.
3. Where more than one trouble is resolved on a specific circuit during the reporting period, each trouble is counted in the Trouble Report Rate.

Exclusions:

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- CLEC or IXC Carrier requests for informational tickets
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation

- Below DS3 (DS0 + DS1)
- DS3 and Above (DS3 + OCn)

Performance Standard

Failure Rate Annualized	- Below DS3	<= 10.0%
	- DS3 and Above	<= 10.0%

ILEC Performance Measurements and Standards

MAINTENANCE & REPAIR

Measurement: JIP-SA-10 Mean Time to Restore

Description

The Mean Time To Restore interval measures the promptness in restoring circuits to normal operating levels when a problem or trouble is referred to the ILEC. Calculation is the elapsed time from the CLEC or IXC Carrier submission of a trouble report to the ILEC to the time the ILEC closes the trouble, less any Customer Hold Time or Delayed Maintenance Time due to valid customer, CLEC, or IXC Carrier caused delays. A breakdown of the percent of troubles outstanding greater than 24 hours, and the Mean Time to Restore of those troubles recorded as Found OK / Test OK, is required for diagnostic purposes.

Calculation Methodology

Mean Time To Restore:

Σ [(Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period)]

% Out of Service Greater than 24 hrs:

[Count of Troubles where (Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times) is > 24 hrs / (Count of Trouble Tickets Resolved in Reporting Period)] x 100

Mean Time To Restore – Found OK / Test OK:

Σ [(Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier as Found OK/Test OK – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period as Found OK/Test OK)]

Business Rules

1. A trouble report or trouble ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. Elapsed time is measured on a 24-hour, seven-day per-week basis, without consideration of weekends or holidays.
3. Multiple reports in a given period are included, unless the multiple reports for the same customer is categorized as "subsequent" (an additional report on an already open ticket).
4. "Restore" means to return to the normally expected operating parameters for the service regardless of whether or not the service, at the time of trouble ticket creation, was operating in a degraded mode or was completely unusable. A trouble is "resolved" when the ILEC issues notice to the CLEC or IXC Carrier that the customer's service is restored to normal operating parameters.
6. Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other CLEC or IXC Carrier caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.

Exclusions:

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- CLEC or IXC Carrier requests for informational tickets
- Trouble tickets created for tracking and/or monitoring circuits
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation

- Below DS3 (DS0 + DS1)
- DS3 and Above (DS3 + OCn)

Performance Standard

Mean Time to Restore	- Below DS3	< = 2.0 Hours
	- DS3 and Above	< = 1.0 Hour
% Out of Service > 24 Hrs		- Diagnostic
Mean Time to Restore – Found OK / Test OK		- Diagnostic

ILEC Performance Measurements and Standards

MAINTENANCE & REPAIR

Measurement: JIP-SA-11 Repeat Trouble Report Rate

Description

The Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had at least one prior trouble ticket any time in the preceding 30 calendar days from the creation date of the current trouble report.

Calculation Methodology

Repeat Trouble Report Rate:

[(Count of Current Trouble Reports with a previous trouble, reported on the same circuit, in the preceding 30 calendar days)] / (Number of Reports in the Report Period) x 100

Business Rules

1. A trouble report or trouble ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when the ILEC issues notice to the CLEC or IXC Carrier that the circuit has been restored to normal operating parameters.
3. If a trouble ticket was closed out previously with the disposition code classifying it as FOK/TOK/CPE/IXC, then the second trouble must be counted as a repeat trouble report if it is resolved to ILEC reasons.
4. The trouble resolution need not be identical between the repeated reports for the incident to be counted as a repeated trouble.

Exclusions:

- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- Subsequent trouble reports – defined as those cases where a customer called to check on the status of an existing open trouble ticket

Levels of Disaggregation

- Below DS3 (DS0 + DS1)
- DS3 and Above (DS3 + OCn)

Performance Standards

Repeat Trouble Report Rate	- Below DS3	<= 6.0%
	- DS3 and Above	<= 3.0%

GLOSSARY

Term	Definition
Access Service Request (ASR)	A request to an ILEC to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms specified in the local exchange company's special or switched access tariffs
Business Days	Monday thru Friday excluding holidays
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready
Facility Check	A pre-provisioning check performed by the ILEC, in response to an access service request, to determine the availability of facilities and assign the installation date
Firm Order Confirmation (FOC)	The notice returned from the ILEC, in response to an Access Service Request from a CLEC or IXC Carrier that confirms receipt of the request, that a facility has been made, and that a service request has been created with an assigned due date
Unsolicited FOC	An Unsolicited FOC is a supplemental FOC issued by the ILEC to change the due date or for other reasons, although no change to the ASR was requested by the CLEC or IXC Carrier
Project	Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes
Query/Reject	An ILEC response to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued
Repeat Trouble	Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days
Supplement ASR	A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.